IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NORTH CAROLINA SOUTHERN DIVISION

No. 7:24-cv-00052

IN RE: CAN WATER LI				
			/	
THIS DOC	UMENT R	RELATES TO:		JURY TRIAL DEMANDED
Waymon	·	Henry	<u>/</u>	
Plaintiff First	Middle	Last	Suffix	

SHORT-FORM COMPLAINT

The Plaintiff named below, or Plaintiff's representative, files this Short Form Complaint against Defendant United States of America under the Camp Lejeune Justice Act of 2022 ("CLJA"). Pub. L. No. 117-168, § 804, 136 Stat. 1802, 1802–04 (2022). Plaintiff or Plaintiff's representative incorporates by reference the allegations contained in the Master Complaint (DE 25) on file in the case styled *In Re: Camp Lejeune Water Litigation*, Case No. 7:23-cv-897, in the United States District Court for the Eastern District of North Carolina. Plaintiff or Plaintiff's representative files this Short-Form Complaint as permitted by Pretrial Order No. 2.

Plaintiff or Plaintiff's representative alleges as follows:

I. INSTRUCTIONS

1. On THIS FORM, are you asserting a claim for	This form may only be used to file a complaint for	
injuries to YOU or to SOMEONE ELSE you legally	ONE PERSON'S injuries. If you intend to bring	
represent?	claims for multiple individuals' injuries—for example,	
■ To me	a claim for yourself and one for a deceased spouse—	
☐ Someone else	you must file ONE FORM FOR EACH INJURED	
	PERSON.	

II. PLAINTIFF INFORMATION

If you checked "To me" in Box 1, YOU are the Plaintiff. Complete this section with information about YOU.

If you checked "Someone else" in Box 1, <u>THAT PERSON</u> is the <u>Plaintiff.</u> Complete this section with information about THAT PERSON.

2. First name: Waymon	3. Middle name:	4. Last name: Henry	5. Suffix:	
6. Sex: ■ Male □ Female □ Other		7. Is the Plaintiff deceased? ☐ Yes ☐ No If you checked "To me" in Box 1, check "No" here.		
Skip (8) and (9) if you che	cked "Yes" in Box 7.			
8. Residence city: Franklin		9. Residence state: Indiana		
Skip (10), (11), and (12) if you checked "No" in Box 7.				
10. Date of Plaintiff's death:	11. Plaintiff's residence state at the time of their death:	12. Was the Plaintiff's dea that resulted from their ex water at Camp Lejeune? ☐Yes ☐No	• • •	

III. EXPOSURE INFORMATION

If you checked "To me" in Box 1, complete this section with information about YOU.

If you checked "Someone else" in Box 1, complete this section with information about THAT PERSON.

13. Plaintiff's first month of exposure to the water at Camp Lejeune: December 1971	14. Plaintiff's last month of exposure to the water at Camp Lejeune: January 1972
15. Estimated total months of exposure: 2	16. Plaintiff's status at the time(s) of exposure (please check all that apply): ■ Member of the Armed Services □ Civilian (includes in utero exposure)
17. If you checked Civilian in Box 16, check all that describe the Plaintiff at the time(s) of exposure: □ Civilian Military Dependent □ Civilian Employee of Private Company □ Civil Service Employee □ In Utero/Not Yet Born □ Other	18. Did Plaintiff at any time live or work in any of the following areas? Check all that apply. □ Berkeley Manor □ Hadnot Point □ Hospital Point □ Knox Trailer Park □ Mainside Barracks □ Midway Park □ Paradise Point □ Tarawa Terrace □ None of the above ■ Unknown

IV. INJURY INFORMATION

If you checked "To me" in Box 1, complete this section with information about YOU.

If you checked "Someone else" in Box 1, complete this section with information about THAT PERSON.

19. Identify the illnesses or conditions the Plaintiff suffered as a result of exposure to contaminated water at Camp Lejeune.

Injury	Approximate date of onset
☐ Adverse birth outcomes (Plaintiff is the PARENT of an individual who died in	
utero or was stillborn or born prematurely)	
□ALS (Lou Gehrig's Disease)	
☐Aplastic anemia or myelodysplastic syndrome	
☐Bile duct cancer	
□Bladder cancer	
□Brain / central nervous system cancer	
□Breast cancer	
☐ Cardiac birth defects (Plaintiff was BORN WITH the defects)	
□Cervical cancer	
□Colorectal cancer	
☐ Esophageal cancer	
☐ Gallbladder cancer	
☐ Hepatic steatosis (Fatty Liver Disease)	
☐Hypersensitivity skin disorder	
□Infertility	
☐Intestinal cancer	
■ Kidney cancer	2011
■Non-cancer kidney disease	2011
□Leukemia	
□Liver cancer	
□Lung cancer	
☐Mutliple myeloma	
□Neurobehavioral effects	
□Non-cardiac birth defects (Plaintiff was BORN WITH the defects)	
□Non-Hodgkin's Lymphoma	
□Ovarian cancer	
□Pancreatic cancer	
□Parkinson's disease	
□Prostate cancer	
□Sinus cancer	
□Soft tissue cancer	
□Systemic sclerosis / scleroderma	
☐ Thyroid cancer	

The Camp Lejeune Justice A	Act does not specify a list of	of covered conditions.		
	osure to the water at Cam	ndition not listed above, and the p Lejeune as required under the		
		of the U.S. Department of Vete ne for conditions beyond those l		
□Other:		Ā	Approximate date of onset	
	V. REPRESENT	ATIVE INFORMATION		
If you ahookod "To mo" in I	· · ·			
		<u>ION</u> and proceed to section VI		
		is section with information abo	_	
20. Representative First Name:	21. Representative Middle Name:	22. Representative Last Name:	23. Representative Suffix:	
24. Residence City:		25. Residence State:		
		□Outside of the U.S.		
26. Representative Sex: ☐Male				
□Female □Other				
27. What is your familial	•	iff?		
☐ They are/were my spouse. ☐ They are/were my parent. ☐ They are/were my parent.				
☐ They are/were my child. ☐ They are/were my sibling. ☐ Other familial relationship: They are/were my				
□No familial relationship.				
Derivative claim		1.44.00%		
28. Did the Plaintiff's death or injury cause the Plaintiff's spouse, children, or parents mental anguish, loss of financial support, loss of consortium, or any other economic or non-economic harm for which you				
intend to seek recovery? □Yes				
□No				

VI. EXHAUSTION

29. On what date was the administrative claim for 30. What is the DON Claim Number for the this Plaintiff filed with the Department of the Navy administrative claim? (DON)? mm/dd/vvvv 02/17/2023

■DON has not yet assigned a Claim Number

VII. CLAIM FOR RELIEF

Plaintiff respectfully requests that pursuant to subsection 804(b) of the CLJA the Court enter judgment against the Defendant and award damages and all other appropriate relief for the harm to Plaintiff that was caused by exposure to the water at Camp Lejeune.

VIII. JURY TRIAL DEMAND

Plaintiff demands a trial by jury of all issues so triable pursuant to Rule 38 of the Federal Rules of Civil Procedure and subsection 804(d) of the CLJA.

Dated: February 2, 2024

Signature

Tiffany Webber Carpenter CORY WATSON, P.C. 2131 Magnolia Avenue South Birmingham, AL 35205

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